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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
DIVISION OF EUGENE

CORINA VICTORIO, MARGARITA
SOLIS, SHARA BURRIS, CHYRAL
PEREZ, and ROBERT TIPSWORD,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

STAHLBUSH ISLAND FARMS, Inc.,

Defendant.

Case No. 6:10-CV-6061-AA

CLASS ACTION

**PLAINTIFF'S UNOPPOSED MOTION
FOR CERTIFICATION OF A
SETTLEMENT CLASS AND
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

ORAL ARGUMENT REQUESTED

LOCAL RULE 7.1(A) CERTIFICATION

Plaintiffs' counsel hereby certifies that we have conferred with defense counsel regarding the matters raised in this motion. Stahlbush Island Farms, Inc. ("Stahlbush") does not oppose certification of a class for settlement purposes and the remainder of plaintiffs' motion.

MOTION

Plaintiffs Corina Victorio, Margarita Solis, Shara Burris, Chyral Perez, and Robert Tipsword ("Plaintiffs") have negotiated with Stahlbush a settlement (the "Settlement") of the

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CLASS AND PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

claims they make on their own behalf and on behalf of a class of over 100 current and former employees.

The Settlement Class consists of all current and former employees of Stahlbush who, according to Stahlbush's recordkeeping, worked time on projects, jobs, or tasks between March 10, 2008 and March 10, 2010 that under Stahlbush's current overtime policy would be eligible for overtime, who were not paid overtime wages (1.5 times their regular rate of pay for any time worked over 40 hours in any workweek and/or 10 hours in any workday during that period). Excluded from the class are any current or former employees that have signed releases with Stahlbush.

Plaintiffs hereby move the Court for an order: (i) certifying a class for settlement purposes; (ii) preliminarily approving the proposed Settlement; and (iii) setting a hearing to consider final approval of the Settlement, and to consider Plaintiffs' Counsel's request for an award of fees and costs to counsel for plaintiffs from Stahlbush.

This motion is supported by the Stipulation of Settlement signed by the parties, and a supporting memorandum, both of which have been filed concurrently with the Court.

DATED this 10th day of May, 2011.

STOLL STOLL BERNE LOKTING & SHLACHTER P.C.

By: /s/ Steve D. Larson

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